

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CORNELL HOLDEN and MIGUEL MEJIA, on	:
behalf of themselves and all others similarly	:
situated,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
THE PORT AUTHORITY OF NEW YORK AND	:
NEW JERSEY; THE PORT AUTHORITY	:
POLICE DEPARTMENT; and MICHAEL	:
OPROMALLA, SHAUN KEHOE, JOHN TONE,	:
JORDAN ESPOSITO, MICHAEL DEMARTINO,	:
RICHARD AYLNER, PAUL MILLER, JOHN	:
FITZPATRICK, PAUL O'DELL and OFFICERS	:
JOHN DOE 1-97, sued in their individual capacities:	:
and official capacities as officers of the Port	:
Authority Police Department,	:
	:
Defendants.	:
----- X	

**1:17-cv-02192-JGK-RWL**  
**PLAINTIFFS' NOTICE OF**  
**MOTION FOR**  
**CLASS CERTIFICATION**

**PLEASE TAKE NOTICE THAT**, upon this Notice of Motion, and the concurrently filed documents, including the Memorandum of Law, and the supporting declaration of Seth E. Spitzer and the exhibits attached thereto, and upon other records on file in this matter and all of the papers and proceedings heretofore had herein, and upon any further material and argument presented to the Court at the time of any hearing or oral argument, Plaintiffs Cornell Holden and Miguel Mejia, on behalf of themselves and the putative class, will move this Court, before the Hon. Robert W. Lehrburger, at the United States Courthouse, 500 Pearl St., New York, New York, for an Order granting class certification in favor of Plaintiffs and against Defendants The Port Authority of New York and New Jersey, the Port Authority Police Department, and Michael Opromalla, Shaun Kehoe, John Tone, Jordan Esposito, Michael DeMartino, Richard Aylmer, Paul Miller, John Fitzpatrick, Paul O'Dell, and Officers John Doe 1-97 (collectively "Defendants") on the grounds that: Plaintiffs' putative class satisfies the Requirements of Fed. R. Civ. P. Rule 23(a), b(2) and

b(3) and is therefore appropriate for certification.

In accordance with Local Rule L.R. 6.1(b), Defendants' response must be filed within fourteen days after service of the moving papers, and Plaintiffs' reply must be served within seven days after service of the answering papers.

Plaintiffs respectfully request that oral argument on this Motion be set for a date and time by the Court.

June 14, 2018

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